

Exhibit A

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United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SANJAY BHATNAGAR

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

Case No. 14-cv-00327-MEJ (LB)

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH
PREJUDICE**

As authorized by Federal Rule of Civil Procedure 41(a), Plaintiff Sanjay Bhatnagar and Defendant United States of America, having entered into a settlement agreement and each party having executed the agreement, hereby stipulate to dismissal with prejudice of all of Mr. Bhatnagar's claims against the United States in this action.

Each party will bear its own costs and attorneys' fees.

It is so stipulated, through counsel of record.

Exhibit A

July 20, 2017

FARELLA BRAUN + MARTEL LLP

By: /s/ Alex Reese
Alex Reese

Attorneys for Plaintiff Sanjay Bhatnagar

July 21, 2017

BRIAN J. STRETCH
United States Attorney

By: /s/ Robin M. Wall
Robin M. Wall
Assistant United States Attorney

Attorneys for Defendant United States of
America

FILER'S ATTESTATION

In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in the
filing of this Stipulation and (Proposed) Order.

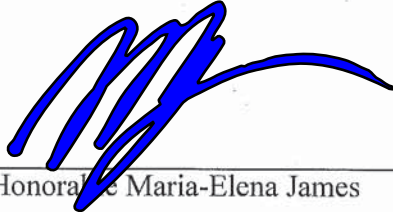
August 22, 2017


Robin M. Wall

[PROPOSED] ORDER

Pursuant to stipulation; IT IS SO ORDERED.

Date: August 28, 2017


Honorable Maria-Elena James
United States Magistrate Judge